



Cal-IPC

California Invasive Plant Council

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April 11, 2005

Regulatory Analysis and Development, PPD
USDA Animal and Plant Health Inspection Service
Station 3C71
4700 River Road
Unit 118
Riverdale, MD 20737-1238

RE: Docket No. 03-069-1

On behalf of the Cal-IPC board and membership, I am submitting comments on the proposed rulemaking regarding phytosanitary restrictions on the importation of plants for planting.

Cal-IPC is dedicated to protecting California natural areas from invasive plants, and our members comprise land managers, researchers, volunteer restorationists and concerned citizens. Horticulture is the top pathway for introduction of invasive plants in California historically, and we have an active working partnership with the horticultural community to deal with invasives still in the trade. We are encouraged that APHIS is considering how to strengthen programs for preventing importation of invasive plants.

We support requiring shipments of plants for planting to list their contents using accurate scientific names. This will be a cornerstone of tracking and monitoring problem species.

We support development of a comprehensive screening protocol for proposed new importations. This protocol should be science-based and transparent, and should have regular public review. We understand the balance that must be struck between allowing relatively unimpeded importation of safe plants while screening out invasive plants. We encourage APHIS to be conservative in protecting U.S. natural areas from invasive plants. Pest risk assessments (PRAs) should be required for all new plants proposed for importation, as spelled out in Option 1. A clear screening protocol should streamline the PRA process so that it does not result in undue delay for importers.

While we respect the needs of nurseries and gardeners, and want to avoid any unnecessary restriction on plant importation, we strongly support measures that account for the significant ecological and economic risks to native species and ecosystems posed by introduction of invasive plants through the horticultural trade.

Sincerely,

Doug Johnson
Executive Director